EXHIBIT K

Jerome L. Green

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et al.,)

Plaintiffs,) C.A. No. 05-399-JJF

v.)

STANLEY TAYLOR, et al.,)

Defendant.)

Deposition of JEROME L. GREEN taken pursuant to notice before Renee A. Meyers, Certified Realtime Reporter and Notary Public, in the Sussex Correctional Center, Georgetown, Delaware, on Thursday, June 28, 2007, beginning at approximately 9:00 a.m., there being present:

APPEARANCES:

DEPARTMENT OF JUSTICE
STACEY XARHOULAKOS, ESQ.
820 North French Street, 6th Floor
Wilmington, Delaware 19801
for Defendants.

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2 (Pages 2 to 5)

Page 2 Page 4 P				2 (Pages 2 to 5
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Q. So this is not case where you are proceeding as a				
	_ 1	2. Do you know sames witson:	Z 4	Q. So this is not case where you are proceeding as a

Jerome L. Green

(Pages 6 to 9) Page 6 Page 8 1 group; each person in the case has his own action. 1 2 2 A. Okay. Q. I am going to stop you right there, Mr. Green. 3 3 Q. Have you ever been deposed before? Do you understand the difference between a 4 A. Yeah. 4 plaintiff and a defendant? 5 Q. You have? 5 A. The plaintiff is who you filed the complaint A. (Witness nods.) 6 6 against. We the plaintiff, I guess. 7 7 Q. In what case? Q. So the people that you were just listing, those 8 A. I'd say -- I won't say me personally, what's up 8 the plaintiffs. with my charge. Do you know what I am saying? 9 9 A. Okay. 10 Q. This is not a criminal matter, so this --10 Q. My question for you is: Do you know who the 11 A. Yeah. 11 defendants are? 12 Q. In relation -- in any case that wasn't criminal, 12 A. You are talking about Stan Taylor. 13 have you had your deposition taken? 13 Q. The people who have been sued. 14 A. Uh-uh. 14 A. Stolzenbach, Carmine, Hollis. A lot of them go 15 Q. Is that a no? 15 -- I try and stay away from them in that building? 16 16 A. No. Q. Have you been reading the Court documents you 17 Q. Do you understand what the process is or would receive in this case? 17 18 you like me to explain it to you? 18 A. Most of them. 19 A. Explain it to me. 19 Q. Are you aware that the Court has narrowed the 20 Q. Everything that you say is sworn testimony. You 20 case and most of the defendants are no longer in the 21 were sworn at the beginning of the deposition, and it's 21 22 being transcribed by the court reporter. And that's 22 A. Mm-hmm. I seen about nine or ten guys left, 23 because it can be used in trial or it can be used for 23 something like that. 24 the parties to file a motion to either dismiss the case 24 Q. Of the people who were sued, do you understand Page 7 Page 9 1 or to narrow the claims in the case. that a lot of them are no longer in the case? 2 2 There is going to be a record that's created, and A. Mm-hmm. 3 because I scheduled the deposition, this is something 3 Q. Is that a yes? 4 that my office is purchasing. If you wanted a copy of 4 5 it, you could purchase a copy yourself. 5 Q. Do you know who is left in the case? 6 Do you understand that? 6 A. Uh-uh. No. 7 A. Mm-hmm. 7 Q. When Mr. Wilson approached you about this 8 Q. Say yes or no. 8 lawsuit, did he ask you if you have had any problems 9 9 with discrimination in the prison? A. Yes. 10 Q. Are you taking any medications now? 10 A. I had a few of them, you know what I am saying? 11 11 A. No. He asked me. 12 Q. Are you taking any at all? 12 Q. He did. Okay. 13 13 And what did you tell him? 14 Q. Do you know who the defendants are in this 14 A. Him said -- before he even, I got into an 15 lawsuit? 15 incident with -- I ain't go on my day off and they had 16 A. Most of them -- yes. Most of them, I work with me moved to another building. 16 17 Q. Who had you moved? them. 17 18 Q. The defendants, do you know who the defendants 18 A. The officer in the building. 19 are? 19 Q. The who? A. Most of them, I work with most of them. 20 20 A. Hollis, Carmine, he was in charge of the building 21 O. Who are the defendants? 21 that day, and what's her name, Miss Melvin, Miss Melvin. 22 22 A. You are talking about Eldridge Potter (sic), a Q. Why were you moved? 23 guy named Potter. Joseph -- what was his name -- I 23 A. Because I didn't go in on my day off. 24 don't know his last name. Another guy named James 24 O. And when was this?

4 (Pages 10 to 13)

1			
	Page 10)	Page 12
2	A. This was about like nine, ten months ago.	1	if you don't have any claims against them
2	Q. Nine or ten months ago?	2	A. I ain't got no problem with them. I am saying,
3	A. Mm-hmm.	3	you know, it's just part of jail as far as I am
4	Q. Do you recall a date?	4	concerned, you know what I mean?
5	A. Not really. I got it written down over there. I	5	Q. Would you like to dismiss the litigation against
6	am just getting back over there probably about six,	6	them?
7	seven months ago.	7	A. I am saying yeah, you can dismiss it.
8	Q. What building were you moved out of?	8	Q. Okay.
9	A. Out of the Merit to Key building.	9	Mr. Green, I have a dismissal here with your name
10	Q. Was that before or after this lawsuit was filed?	10	and their names. If you would like to read it and go
11	A. After.	11	ahead and sign it, you will be out of this case.
12	Q. Before the lawsuit was filed, were there any	12	A. I don't think I want to sign nothing, though.
13	incidents of discrimination against you?	13	Q. Okay. Do you understand what I gave you?
14	A. I am saying it all depends what you want to call,	14	A. Mm-hmm. I ain't going to sign nothing.
15	you know, discrimination, you know what I am saying?		Q. So, before, when you stated you wanted to dismiss
16	just call it being in jail, you know what I mean? Stuff	16	the case, are you changing your mind now?
17	be said and you either go with it or make a big issue	17	A. I just ain't going to sign nothing, you know what
18	out of it. It ain't nothing.	18	I am saying? What's going to happen is going to happen
19	Q. Well, it's important for the case, if it's going	19	anyway. They are going to retaliate, I am still here in
20	to move forward, that we are all clear on what the	20	the jail, so it don't really matter if they go forward
21	allegations of discrimination are, so that's why I need	21	or dismiss it or whatever.
22	to ask you what specifically happened to you that you	22	Q. Well, I just want to I mean, I am not trying
.23	believe was a result of discrimination.	23	to confuse you or trick you. I just want to let you
24	A. That's about it right there, with me, as far as I	24	know where this case stands. There is you and about
	D 11	1	
1	Page 11	The second second	Page 13
1	am concerned.	1	eight other plaintiffs. One of them has already
3	Q. The incident where you were moved?	2	dismissed the case and I am going to depose the rest of
	A. Mm-hmm.	3	them today. I have spoken to Mr. Wilson at Delaware
1 /	Q. But you said that was after the lawsuit was		
4 5	61a49		Correctional Center, and the case has been narrowed,
5	filed?	5	there are two defendants, Stan Taylor and Warden Rick
5 6	A. (Witness nods.)	5	there are two defendants, Stan Taylor and Warden Rick Kearney; okay?
5 6 7	A. (Witness nods.) Q. Was that a yes?	5 6 7	there are two defendants, Stan Taylor and Warden Rick Kearney; okay? At this point, after this deposition and the rest
5 6 7 8	A. (Witness nods.) Q. Was that a yes? A. Yes.	5 6 7 8	there are two defendants, Stan Taylor and Warden Rick Kearney; okay? At this point, after this deposition and the rest that I have today, we are going to file a motion and you
5 6 7 8 9	A. (Witness nods.)Q. Was that a yes?A. Yes.Q. Mr. Green, the remaining — the only remaining	5 6 7 8 9	there are two defendants, Stan Taylor and Warden Rick Kearney; okay? At this point, after this deposition and the rest that I have today, we are going to file a motion and you have a right to respond to that motion. What I was
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	Page 14		Page 16
1	A. Mm-hmm.	1	INDEX TO TESTIMONY
2	Q. Do you understand that?	2	
3	A. Yes.		JEROME L. GREEN PAGE
10	A. Mm-hmm.	9	
11	Q. Did you receive any discovery that I sent to you?	E	(There were no exhibits marked for identification.)
12	There were questions called Interrogatories and Requests	10	
13	for Production; do you recall receiving them?	11	
14	A. I probably did. I don't recall because I am	12	
15	involved in two or three more of them.	13	
16	Q. You did not respond to what I sent; correct?	14	
17	A. Uh-uh.	15 16	
18	Q. Why is that?	17	
19		18	
20	A. Because, you know, I don't think, you know what I	19	
21	mean, it has anything to do with the case as far as, you		
-	know, what's going on, you know. I am saying, you know	21	
22	I am saying that's my opinion. That's why I didn't	22	A CONTRACTOR OF THE CONTRACTOR
23	respond to it.	23	
24	Q. Do you have anything to supplement at this time	24	*
	Page 15		Page 17
1	to those responses that you did not send?	1	CERTIFICATE
2	A. Uh-uh.	2	STATE OF DELAWARE:
3	Q. Is that a no?		
4	A. I don't have anything.	3	NEW CASTLE COUNTY:
5	Q. Mr. Green, what are you currently incarcerated	4	I, Renee A. Meyers, a Registered Professional
6	for?	5	Reporter and Notary Public, within and for the County
7	A. Drug charge and a gun.	6	and State aforesaid, do hereby certify that the
8	Q. When were those charges?	8	foregoing deposition of JEROME L. GREEN, was taken before me, pursuant to notice, at the time and place
9	A. I don't recall. I have been in jail like 13	9	indicated; that said deponent was by me duly sworn to
10	years, you know what I mean?	10	tell the truth, the whole truth, and nothing but the
11	Q. Thirteen years, so was it 1994?	11	truth; that the testimony of said deponent was correctly
12	A. Something like that. About that.	12	recorded in machine shorthand by me and thereafter
13	Q. And what is your expected release date?	13	transcribed under my supervision with computer-aided
14	A. I got life.	14	transcription; that the deposition is a true record of
15	Q. You got life. Okay. And these were multiple	15	the testimony given by the witness; and that I am
16		16	neither of counsel nor kin to any party in said action,
17	felony charges; is that right? A. Mm-hmm. Yes.	17	nor interested in the outcome thereof.
		18 19	WITNESS my hand this 11th day of July A.D. 2007.
18	Q. Mr. Green, you can, if you want, add something to	20	8000000
19	the transcript. It's up to you if there is anything	20	RENEE A. MEYERS
20	that you want to put on the record.	21	REGISTERED PROFESSIONAL REPORTER
21	A. Thank you.		CERTIFICATION NO. 106-RPR
22	(The deposition was concluded at 9:30 a.m.)	22	(Expires January 31, 2008)
23		23	
24		24	